

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DANIELLE CURRY, on her own behalf and as )  
Special Administrator of the Estate of )  
CHRISTOPHER KELLY, deceased, )

Plaintiff, )

vs. )

OFFICER KYLE BURNS (Star #13310), )  
OFFICER KELIN ALTHOFF (Star #4163), )  
OFFICER CHRIS DIEBALL (Star #14889), )  
OFFICER MARK LACIVITA (Star #15136), )  
OFFICER VIRGINIA O'DONNELL (Star )  
#5695), OFFICER BRIAN RIX (Star #15065), )  
OFFICER MICHAEL KEY (Star #8813), SGT. )  
ANGELO MONACO (Star #1595), OFFICER )  
LILIAN ZEPEDA (Star #5920), OFFICER )  
JOYCE SHEAN (Star #10293), OFFICER )  
GABRIELLA CRUZ (Star #2844), OFFICER )  
ERICK GRADY (Star #17129), OFFICER )  
KEVIN HAWKINS (Star #13471), OFFICER )  
ERIC SEHNER (Star #11641), OFFICER )  
ADAM FITZGERALD (Star #7834), and the )  
CITY OF CHICAGO, a municipal corporation, )

Defendants. )

Case No. 15 CV 9152

Judge Lee

JURY DEMAND

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**PLAINTIFF'S UNOPPOSED MOTION TO AMEND EXPERT DISCLOSURE  
DEADLINES**

NOW COMES Plaintiff, by and through respective counsel, and hereby respectfully moves, without opposition or objection, for this Court to amend the existing expert disclosure deadlines set out in the Court's February 23, 2017 order. In support of this motion, the parties state as follows:

1. On February 23, 2017, this Court ordered the following expert disclosure schedule:

Plaintiff's experts to be disclosed by April 21, 2017; Defendants' experts to be disclosed by May 31, 2017 (Dkt. 80).

2. Plaintiff is likely to disclose 2-3 retained experts related to causation. While one of the

experts is prepared to tender a final report by the Court's current deadline of April 21,

the other experts require additional time to workload as well as the amount of information and evidence that is necessary for them to review in this case.

3. As such, Plaintiff requests a 21 day extension and an amendment to the schedule as follows: Plaintiff's experts to be disclosed by May 12, 2017; Defendants' experts to be disclosed by June 21, 2017.
4. The undersigned has conferred with Defendants' counsel, Mr. Engquist, regarding this motion and was informed that there is no objection to the requested amended schedule.

**WHEREFORE**, Plaintiff respectfully requests that this Honorable Court grant the Plaintiff's Unopposed Motion to Amend Expert Disclosure Deadlines, and for any other relief this Court deems just.

/s/ Ronak Maisuria  
One of Plaintiff's attorneys

/s/ Dana Pasha  
One of Defendants' attorneys

#### **CERTIFICATE OF SERVICE**

Ronak Maisuria, a licensed attorney, states that on April 20, 2017, the foregoing motion was served on all opposing attorneys *via ECF*.

/s/ Ronak Maisuria

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